## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 19 CR 77
v.	)	
	)	Judge Elaine E. Bucklo
MICHAEL LIEDTKE	)	

## DEFENDANT MICHAEL LIEDTKE'S SENTENCING MEMORANDUM

Defendant Michael Liedtke, by and through his counsel, respectfully submits this Sentencing Memorandum for the Court to consider relative to Michael's sentencing.

It would be an understatement to state to the Court that this case has been profoundly difficult for Michael. He is consumed with guilt and remorse, for he deeply regrets his mistakes in judgement for his past actions that have led him to this moment in his life. Despite Michael's lapse in judgment, he respectfully asks this Court to consider the mitigating aspects of his life and circumstances relative to the offense to which he has entered a plea of guilty to.

### I. Michael's Contrition

First of all, Michael is extremely sorry and apologizes for his misdeeds in connection to any harm he has caused to any and all of the victims in this case. He regrets that he lost sight of who he is and was as a person, and that he did not obtain the necessary counseling that he undoubtedly needed in the past to address the problems with his sexual desires. This regret and sorrow that Michael has far exceeds the embarrassment that he has brought upon himself, his friends, and his family. It is without a doubt that Michael has accepted responsibility for his conduct, and is ready to receive and respect whatever sentence this Court deems appropriate.

#### II. Personal Life

Throughout my representation of Michael, I have gotten to know much about him, his mindset, and how his family and friends perceive him. It has been very clear to me, as indicated by the letters that these people have written for him, that Michael is deeply cared for. He has earned respect and admiration from his colleagues, family members, and lifelong friends alike, due to his efforts to be there for them whenever they needed help in their lives.

Michael's professional and personal life has been punctuated with his efforts to try and be a positive and contributing member of society. While in college at Western Illinois University, Michael studied criminal justice and law enforcement, as he had a passion to try and make a positive difference in people's lives. This is also evident in that he went on to become employed with the Kane County Department of Corrections for approximately three years. In fact, I would respectfully suggest to the Court that a review of Michael's life would reveal an individual whom had never previously been arrested, and by many accounts had lead an exemplary life. This notion certainly appears to be a recurring theme in Michael's life, according to those who know him well.

I also believe it important to note that Michael fully understands the gravity of his misconduct. Since the day that Michael was arrested, he has expressed nothing but regret for his actions, a determined willingness to seek help to address his behavior, and he has renewed his relationship with God. In fact, he even has been leading a bible group while he has been incarcerated during the pendency of this case. Simply put, it has become quite clear that Michael is on a mission to right his wrongs to the extent that he is able to, and to turn his life around for the better.

## Conclusion

Michael truly feels profound remorse and regret for his actions in this case, and accordingly, is ready to accept the consequences for it. He knows that what he did was wrong, and is truly interested in receiving help in the form of counseling, and wants to become a better man. Since he has been arrested, he has demonstrated in every way that he is able to so.

For the foregoing reasons, the defense respectfully requests that the Court impose the mandatory minimum sentence of five years in this case.

Respectfully submitted,

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# **CERTIFICATE OF SERVICE**

I, Kendall D. Hartsfield, hereby certify that on January 24, 2020, I caused a copy of the foregoing to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system, which will send notification of such filing to all attorneys of record.